

Exhibit U

VOL. I
PAGES 1-124
EXHIBITS 1-20

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

C.A. NO.: 04-CV-11340DPW

* * * * *
STEPHEN KEEFE,

PLAINTIFF,

VS

LOCALS 805, INTERNATIONAL
LONGSHOREMEN'S ASSOCIATION,
AFL-CIO, ET. AL,
DEFENDANTS.

* * * * *

DEPOSITION OF STEPHEN KEEFE, taken on
behalf of the Defendants, pursuant to the
applicable provisions of the Federal Rules of
Civil Procedure, before Bernadette J. D'Alelio,
Notary Public and Court Reporter within and for
the Commonwealth of Massachusetts, at the
Offices of Mullen & McGourty, 52 Temple Place,
Boston, Massachusetts, on May 8, 2006,
at 10:01 a.m., as follows:

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1 A. Yes.

2 Q. Do you still have your answers to the
3 admissions in front of you?

4 A. Yes.

5 Q. Would you turn to Page 2, please.

6 Do you see request Number 4 where it
7 says, "Rule 37 of the hiring hall work rules
8 for Local 799, 800, and 805 permits a six-month
9 suspension from a gang or steady job for a
10 member's violation of his pledge or due to his
11 failure to appear before the rules committee
12 when summoned."

13 And you admitted that in your answers;
14 is that right? I'm asking you to look at Page
15 2 of the admissions.

16 A. I know.

17 Q. You admitted that to be a correct
18 statement; is that right?

19 A. Yes.

20 Q. And so you also understood when you
21 admitted that in January of 2006 that that
22 admission was referring directly to what we've
23 now marked as Exhibit 5 as the hiring hall
24 rules, right?

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1 A. Yes.

2 Q. At the bottom of Page 2, Request
3 Number 7 on May 25, 2000, you signed a pledge
4 sheet affirming your compliance with hiring
5 hall rule 36 as it existed in May of 2000, and
6 then you answer "admitted"; is that right?

7 A. Yes.

8 Q. And then in Request Number 8 in May of
9 2000, you signed a pledge with Local 805. You
10 were working exclusively at the craft of being
11 a longshoreman. And you answered "admitted,"
12 is that right, on Page 3?

13 A. Yes.

14 MR. MAHONEY: Mark that as the
15 next exhibit, please.

16 (Exhibit-6, Pledge Dated 5/25/00,
17 marked for identification.)

18 BY MR. MAHONEY:

19 Q. We were just talking about the pledge
20 that you signed in May of 2000. I'm going to
21 show you what we now marked as Exhibit 6 to
22 this deposition and ask if that is the pledge
23 that you signed on May 25, 2000, or a copy of
24 it?

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1 A. Yes.

2 Q. When you read that, those words on
3 Exhibit Number 6, you understood them; is that
4 right?

5 A. Yes.

6 Q. Otherwise, you wouldn't have signed
7 it, right?

8 A. Yes.

9 Q. You understood the capitalized,
10 underlined phrase "working at this craft
11 exclusively," otherwise you wouldn't have
12 signed it, right?

13 A. Yes.

14 Q. John T. Clark & Son, they're contract
15 stevedores and marine terminal operators, is
16 that right, or they were?

17 A. Yes.

18 Q. What type of work did Local 805 do?

19 A. Union work.

20 Q. Are they stevedores?

21 A. No.

22 Q. They are not. Are they longshoremen?

23 A. Yes.

24 Q. What does a longshoreman do?

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1 A. A variety of things, unload ships, car
2 jobs.

3 Q. Drive cars off of ships. Anything
4 else?

5 A. Salt jobs.

6 Q. What is a salt job?

7 A. Unload salt passenger ships.

8 Q. A longshoreman works down at the dock
9 at a port, regardless of where it is, right?

10 A. Yes.

11 Q. And could you generally say that a
12 longshoreman is a laborer who will unload all
13 types of cargo from ships that is brought into
14 the port; is that right?

15 A. Yes.

16 MR. MAHONEY: Let's mark this as
17 the next exhibit, please.

18 (Exhibit-7, Letter Dated 5/24/00,
19 marked for identification.)

20 BY MR. MAHONEY:

21 Q. I'm going to show you, Mr. Keefe, what
22 we've marked as Exhibit 7 and ask if you
23 recognize this document?

24 A. Yes.

11 (Pages 38 to 41)

DUNN & GOUDREAU

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